

**BEST AVAILABLE COPY****III. REMARKS**

Claims 1-22 are pending in this application. By this amendment, claims 1, 6, 7, 11, 14, 15 and 18 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-22 are rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Goldberg *et al.* (U.S. Patent No. 6,496,833), hereafter "Goldberg." Applicants respectfully traverse this rejection for the following reasons.

With regard to the 35 U.S.C. §102(e) rejection over Goldberg, Applicants assert that Goldberg does not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 6, 11, 14, 15 and 18, Applicants respectfully submit that Goldberg does not disclose that, *inter alia*, "...each of the at least one physical code generator generates physical code corresponding to a specific performed operation," as recited in claim 1 and claimed similarly in claims 6, 11, 14, 15 and 18. Instead, the passage of Goldberg cited by the Office discloses that code generator classes depend on the implementation language and the underlying DBMS language. Col. 12, lines 14-17. To this extent, each of the code generator classes in Goldberg depends on implementation language and DBMS language, and does not correspond to a specific performed operation. Nowhere does Goldberg teach a plurality of code generators that each generates code corresponding to a specific performed operation. In contrast, the claimed invention includes "...each of the at least one physical code generator generates

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physical code corresponding to a specific performed operation.” Claim 1. As such, each of the at least one physical code generators of the claimed invention does not only depend on implementation language and DBMS language as do the code generator classes in Goldberg, but instead, generates code that corresponds to a specific performed operation. Thus, the generator class of Goldberg is not equivalent to the code generator of the claimed invention. In view of the foregoing, Applicants respectfully submit that Goldberg fails to teach each and every feature of the claimed invention. Accordingly, withdrawal of the above-cited rejections is requested.

With further respect to independent claims 1, 11, 14, 15 and 18, and with respect to dependent claim 7, Applicants respectfully submit that Goldberg also fails to teach that, *inter alia*, “...said generator dictionary is adapted to be amended by the user to replace at least one code generator with a replacement code generator,” as recited in claim 1 and claimed similarly in claims 7, 14, 15 and 18. The passage of Goldberg cited by the Office teaches

Other DBMS APIs may also be accommodated by adding new subclasses to the class hierarchy as indicated schematically by dotted class (ODBCJavaQueryObjectImplGenerator). Each database that is added requires a separate subclass with a specific DBMS API interface.”

To this extent, Goldberg teaches only adding new subclasses for accommodating DBMS APIs and does not teach replacing a subclass with a replacement subclass. The claimed invention, in contrast, includes “...said generator dictionary is adapted to be amended by the user to replace at least one code generator with a replacement code generator.” Claim 1. As such, as opposed to the new subclasses in Goldberg that can only be added, in the current invention, a user may amend the generator dictionary by at least one code generator with a replacement code generator. For the above reasons, the addition of new subclasses of Goldberg does not teach the user

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replacement of at least one code generator with a replacement code generator as included in the present invention. Accordingly, Applicants request that the rejection be withdrawn.


With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

**IV. CONCLUSION**

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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